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**REPLY REGARDING
DEINDEXING ORDER
OF AUGUST 21, 2020**

Eugene Volokh
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Counsel for Duck Duck Go, Inc.

November 3, 2020

Via Email (PreskaNYSDChambers@nysd.uscourts.gov)

Hon. Loretta A. Preska
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Allen v. Chanel, Inc., No. 12 Civ. 6758 (LAP).

Dear Judge Preska:

We represent the search engine Duck Duck Go, Inc. (“DuckDuckGo”). Please accept this reply letter in connection with the Court’s September 30, 2020 Order inviting comments regarding the Court’s August 21, 2020 search engine deindexing order.

¹ Ms. Gray and Prof. Volokh have not been admitted *pro hac vice*, but were informed by this Court that they may sign correspondence with the Court addressing the deindexing order alongside the counsel of record.

Hon. Loretta A. Preska, U.S.D.J.

November 3, 2020

Page 2

DuckDuckGo appreciates the personal and professional difficulties Ms. Allen is facing, and her interest in getting employment. But that interest cannot overcome DuckDuckGo's and others' rights under the First Amendment, the Due Process Clause, and the Rule 65 limitations on the scope of injunctions (limitations that help protect due process rights).

Respectfully submitted,

/s Daniel L. Schmutter

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